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September 27, 2023

**BY ECF**

Hon. Colleen McMahon  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *People of the State of New York v. City of New York, et al.*  
SDNY No. 20-cv-8924 (CM)(GWG) (consolidated actions)

Dear Judge McMahon:

We write as counsel to the Police Benevolent Association (“PBA”), in response to the September 26, 2023 letter (ECF No. 1112) sent by Travis England on behalf of all remaining Plaintiffs seeking injunctive relief in the consolidated actions.

Mr. England proposes the following dates if the extension requested by my letter of yesterday (ECF No. 1111) is granted: Settling Parties’ responses, November 1, 2023; the PBA’s reply, November 8, 2023; November 6 conference, adjourned to the following week.

We do not object to Mr. England’s proposed date for the Settling Parties’ responses, but request that the PBA’s time for reply remain at 11 days as in the Court’s September 8, 2023 scheduling order (ECF No. 1107), rather than cut to 7 days as Mr. England proposes. Since the 11th day would be Sunday, November 12, we request that the PBA’s reply be set at Monday, November 13, 2023. We agree that the November 6 conference should be adjourned to the week of November 13 (or such other date as the Court deems best.)

Further to Part I(D)(2) of your Individual Practices, we submit herewith a proposed order reflecting these dates.

Respectfully,



Thomas A. Kissane

**Copies To:**

All counsel in Consolidated Actions (via ECF).